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June 20, 2025

**VIA ECF**

Hon. Margaret M. Garnett  
District Court Judge  
US District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Dennis Dumas v. Kroll, LLC - Civil Action No. 1:23-cv-05013-MMG

Dear Judge Garnett:

We represent Defendant Kroll, LLC in the above-captioned action. Pursuant to Your Honor's Individual Rule D(3), Rule 5.2 of the Federal Rules of Civil Procedure, and the Southern District's Electronic Filing Rules & Instructions 6 and 21, we respectfully request permission to file under seal and redact certain information and documents filed in connection with Defendant's Motion for Summary Judgment.

Defendant respectfully requests permission to file the following documents under seal pursuant to the parties' Amended Stipulated Confidentiality and Protective Order (ECF No. 21) and Your Honor's Individual Rules and Practice: (1) the Declaration of Colton Lewis, and corresponding Exhibits N-R; (2) the Joint 56.1 Statement of Undisputed Facts and (3) Kroll's Memorandum of Law in Support of its Motion for Summary Judgment. These documents contain confidential employee information: the names or identifying information of former Kroll employees who were placed on performance improvement plans ("PIP"). These persons are not parties of this litigation. Defendant respectfully requests to file the aforementioned documents with redactions to the names or identifying information of former Kroll employees who were placed on PIPs. The redactions are limited to those required to protect information identified as confidential during discovery.

Kroll has met and conferred with Plaintiff and Plaintiff consents to filing the aforementioned documents under seal and with redactions. The parties thank you for Your Honor's kind consideration of this request.

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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ *Ephraim J. Pierre*

Ephraim J. Pierre

Enclosures

cc: Counsel of Record (via ECF)

Application GRANTED. Dkt. Nos. 49, 50, and 51 shall remain under seal and the redactions contained in corresponding Dkt. Nos. 42, 43, and 46 are approved as the minimum measures necessary to protect the confidential personal information of non-parties, which is sufficient to outweigh the presumption in favor of public access to judicial documents. The Clerk of Court is respectfully directed to terminate Dkt. No. 48.

SO ORDERED. Date: 6/23/2025.



HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE